

**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In re:

JAMES FITZGERALD BOWYER,

*Debtor.*

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THE KIM LAW FIRM LLC and

RICHARD KIM,

*Plaintiffs,*

v.

JAMES FITZGERALD BOWYER,

*Defendant.*

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Chapter 7

Case No. 19-13113(MDC)

Adv. No. 19-00200(MDC)

**REQUEST FOR CLERK'S ENTRY OF DEFAULT**

Plaintiffs, The Kim Law Firm LLC and Richard Kim, by and through their undersigned counsel, pursuant to Fed. R. Civ. Proc. 55 and Bankruptcy Rule 7055, hereby request that Clerk of the Court enter a Notice of Default in the above-captioned matter. The Plaintiff duly served the Complaint on November 21, 2019. (ECF 8). The Court entered an Order on September 10, 2020 (ECF No. 14) granting in part and denying in part Defendant's Motion to Dismiss, and the Defendant's Answer was due on October 12, 2020. The Defendant, James Fitzgerald Bowyer has not filed a response to the Complaint.

Respectfully submitted,

**OFFIT KURMAN, P.A.**

By: /s/Ryan N. Boland

RYAN N. BOLAND, ESQUIRE

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Dated: July 5, 2021

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

*Defendant.*

Adv. No. 19-00200(MDC)

## CERTIFICATE OF SERVICE

I, Ryan Boland, Esquire, certify that a true and correct copy of this document was caused to be electronically filed this 6<sup>h</sup> day of July, 2021 with the Court's CM/ECF system, sending notification to all counsel of record.

Thomas D. Kenny, Esquire  
Eileen T. Burns, Esquire  
Kenney, Burns & McGill  
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*Counsel for Chapter 7 Debtor*

Lynne E. Feldman, Esquire  
221 North Cedar Crest Boulevard  
Allentown, PA 18104  
*Chapter 7 Trustee*

*-continued on following page-*

United States Trustee  
Office of the U.S. Trustee  
200 Chestnut Street  
Suite 502  
Philadelphia, PA 19106

Respectfully submitted,

**OFFIT KURMAN, P.A.**

By: /s/Ryan N. Boland  
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Dated: July 6, 2021